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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**ORIGINAL**

November 22, 2002

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**VIA COURIER**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: SNIp LiNK, LLC  
WCB Docket Nos. 01-338, 96-98, 98-147  
Notice of *Ex Parte* Presentation

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, SNIp LiNK, LLC ("SNIp"), by its undersigned counsel, hereby gives notice that on November 21, 2002, its representatives met separately with Matthew Brill, Senior Legal Advisor to Commissioner Abernathy, Jordan Goldstein, Senior Legal Advisor to Commissioner Copps, Daniel Gonzalez, Senior Legal Advisor to Commissioner Martin, and Christopher Libertelli, Legal Advisor to Chairman Powell to discuss SNIp's views on the FCC UNE Triennial Review proceeding. Representing SNIp along with the undersigned were Anthony Abate, President & Chief Technology Officer, and Joseph Polito, Director of Telecommunications Products. A copy of SNIp LiNK's presentation materials are enclosed.

No. of Copies rec'd  
List ABCDE

*Handwritten signature/initials*

**KELLEY DRYE & WARREN LLP**

Ms. Marlene H. Dortch  
November 22, 2002  
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In accordance with Section 1.1026(b), an original and one copy of this notice is being provided.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven A. Augustino". The signature is stylized with a large initial "S" and a cursive "Augustino".

Steven A. Augustino

SAA/pab  
Enclosure

cc: Matthew Brill  
Jordan Goldstein  
Daniel Gonzalez  
Chris Libertelli

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# SNiP LiNK, LLC

## *Ex Parte* Presentation

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**UNE Triennial Review**  
**WCB Docket Nos. 01-338, 96-98, 98-147**  
**November 21, 2002**



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## Who is SNiP LiNK?

- Founded in 1995, SNiP LiNK is a privately held ISP-CLEC serving New Jersey, Delaware and Southeastern Pennsylvania
  - SNiP LiNK is a five time honoree as one of the fastest growing private businesses in its market. Listed in the Philadelphia 100 in 2002
  - Second largest regional ISP (19,000 subscribers)
  - Customers include Schools, Small Businesses and State Agencies
  - In 2001, SNiP LiNK became EBITDA and cash flow positive. Anticipates **profitability in 2002**
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# Who is SNIPLINK?



- The Pennsauken Corporate Headquarters is composed of 13,200 square feet of office space and 10,800 square feet of data center facilities. The office space houses all business functions which include Administrative, Network, Customer, and Data Operations. A state-of-the-art call center supports Customer Care functions such as sales, service and technical support.
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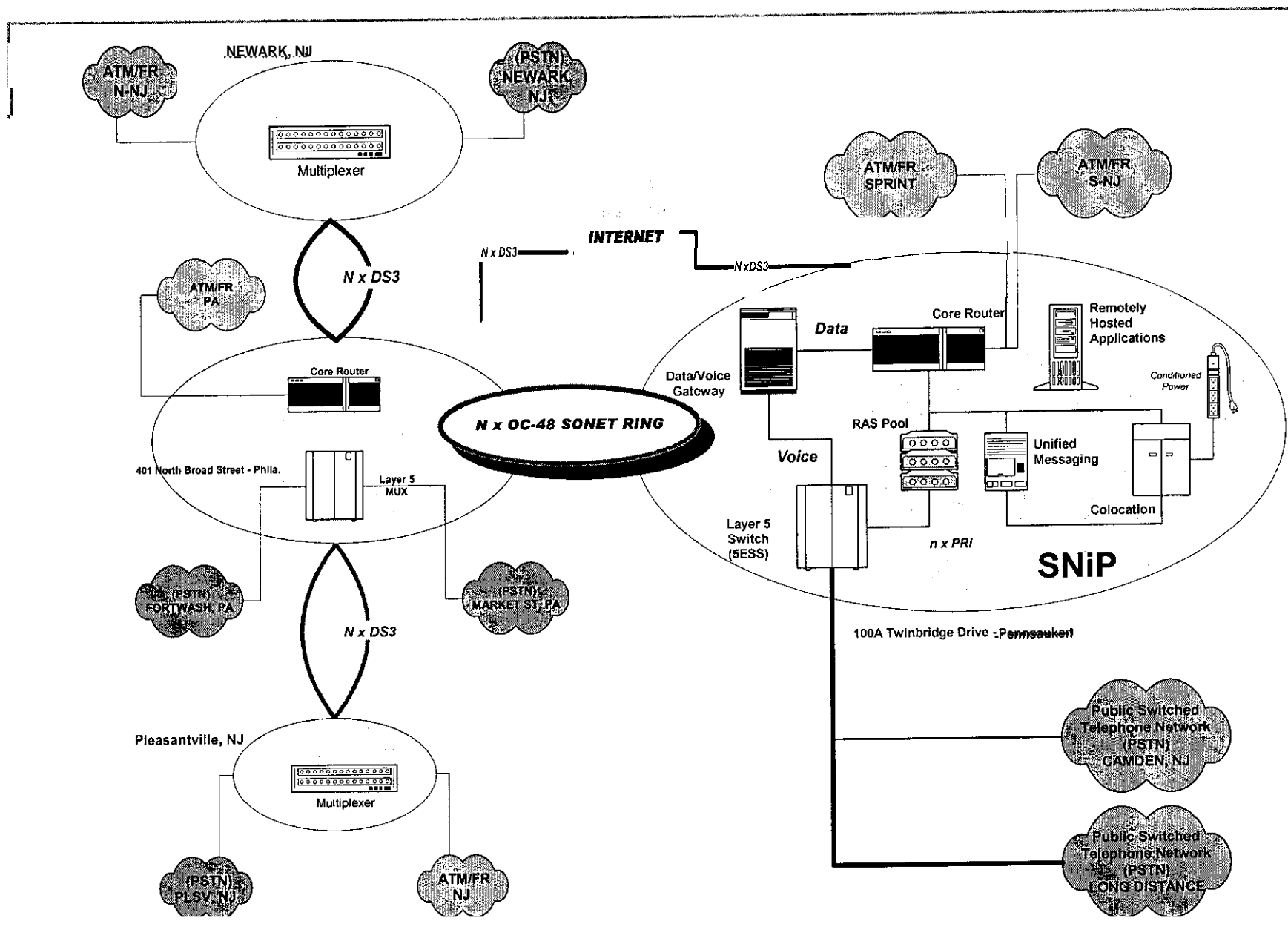
# What does SNIp LiNK offer?

- Dedicated and Dial-up Internet Service
  - WAN and RAS Services
  - Local, Local Toll and Long Distance Voice Telephone Service
  - Remotely Hosted Applications
  - Collocation Services
  - Unified Messaging
  - Convergent Voice and Data Services
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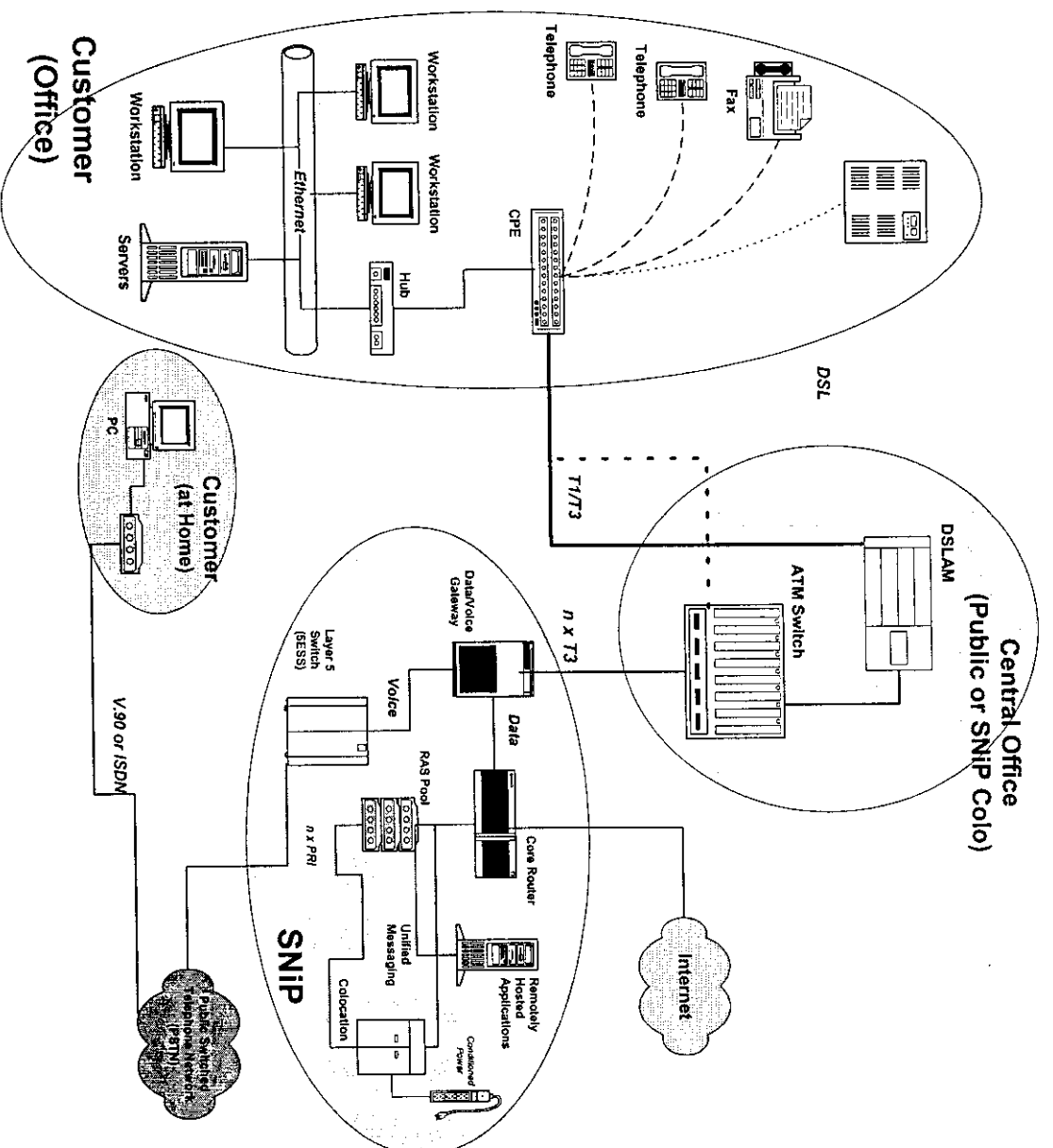
# What is SNIPLINK's Network?

- Only true facilities-based ISP-CLEC serving Delaware, New Jersey and Southeastern Pennsylvania (the “tri-state area”)
  - 3 Collocations located in Philadelphia, Newark and the Jersey Shore
  - In Q2 of 2003 will establish additional POPs in the Baltimore/Hagerstown/Salisbury LATAs
  - Owned and Leased Dark Fiber
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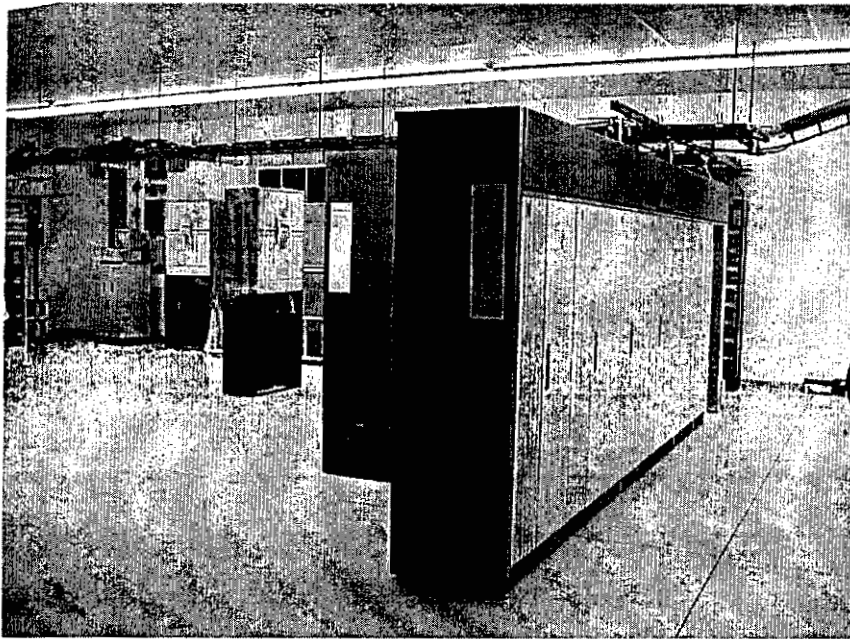
**SNiP LiNK Network Diagram**





# Integrated Communication Solutions

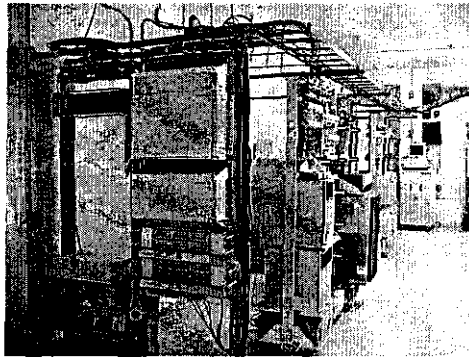
# SNiP LiNK's Data Center



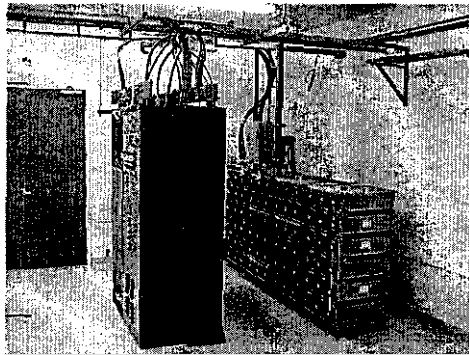
- The data center facilities house all ISP and CLEC equipment which includes dial-in modems, server computers, routers, and the 5ESS phone switch. 50% of the data center is available for collocation.

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# SNiP LiNK's Collocation Sites



- The **401 N. Broad** (Philadelphia PA) location is a 1,000 square foot POP. This location primarily serves as a connection point for SNiP to other phone companies, Internet providers, and business customers on the PA side of the Delaware River in the Philadelphia LATA.



- The **Pleasantville, NJ** POP serves as a connection point to the Atlantic Coastal LATA. This POP enables SNiP to reach the South Jersey shore with Dial-up and Dedicated Internet services.
  - The **Newark, NJ** location is a Sprint Collocation POP. This location serves as a connection point for SNiP to other phone companies and business customers in the North Jersey LATA.
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## Save the “EELs”

- EELs are **critical** to SNiP LiNK’s ability to offer services
    - *only way* for SNiP LiNK to reach customers in areas such as Middletown, DE
    - *only way* for SNiP LiNK to serve customers in multiple locations such as a medium sized newspaper based in Pleasantville, NJ with regional offices in 3 additional towns throughout the state
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## Save the “EELs”

- EELs are the *only feasible* way for SNIPLINK to provide its service throughout the tri-state area
    - ✗ No third party loops to SNIPLINK's customers exist
    - ✗ No third party transport from POPs to customer locations is currently available
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## Save the “EELs”

- Other alternative methods of service are not feasible for SNiP LiNK
    - *Collocation is not economic or desirable* at additional locations
    - Special Access is *too costly*
    - SNiP LiNK *cannot build its own facilities* to efficiently or effectively reach all of its current and potential customers
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# The FCC's Rules Should **SAVE THE “EELs”**

- The FCC's rules should strive to **make EELs ubiquitously available**
  - The FCC should **eliminate any “collocation bias”** in its rules
  - The FCC should **eliminate any anti-data effect** of its rules
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# Conclusion

- EELs are critical to SNIPLINK's ability to offer services
  - Without EELs, no other viable alternative exists for SNIPLINK to provide service throughout the tri-state area
  - The FCC should strive to make EELs ubiquitously available and rationalize any local use rules
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